



COWAN,
DeBAETS,
ABRAHAMS &
SHEPPARD LLP

41 MADISON AVENUE
NEW YORK, NY 10010
T: 212 974 7474
F: 212 974 8474
www.cdas.com

BENJAMIN S. HALPERIN
212 974 7474
BHALPERIN@CDAS.COM

March 3, 2023

VIA ECF

The Honorable Sarah Netburn
S.D.N.Y. Thurgood Marshall Courthouse
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.*, 1:22 Civ 02435 (LLS)(SN)

Dear Judge Netburn:

Defendant Tracy Deebs-Elkenaney p/k/a Tracy Wolff (“Wolff”) writes pursuant to Rule III. D of Your Honor’s Individual Practices regarding filing redacted documents under seal and in connection with the parties’ Protective Order (ECF No. 50) and a Court of Appeals’ opinion in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Wolff filed under seal Exhibits A-D and G-H to the declaration of CeCe Cole in opposition to Plaintiff Lynne Freeman’s February 22, 2023 letter motion (ECF No. 131). These exhibits consist of documents produced by Wolff (Exs. A-D, H) and Defendants Emily Sylvan Kim and Prospect Agency, LLC (Ex. G). Although Wolff would not object to these documents being unsealed, they have been filed under seal out of an abundance of caution. Exhibits E-F were redacted as they contain personal email addresses.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Benjamin S. Halperin

Benjamin S. Halperin

**COWAN, DeBAETS, ABRAHAMS &
SHEPPARD LLP**

Nancy E. Wolff
Benjamin S. Halperin
CeCe M. Cole
41 Madison Avenue, 38th Floor
New York, New York 10010
Tel: (212) 974-7474
Fax: (212) 974-8474
nwolff@cdas.com
bhalperin@cdas.com
ccole@cdas.com

*Attorneys for Defendants Tracy Deeb-
Elkenaney p/k/a Tracy Wolff, Entangled
Publishing, LLC, Holtzbrinck Publishers,
LLC d/b/a Macmillan, and Universal City
Studios LLC*

Cc: All counsel of record (via ECF)